

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

<b>TANGLEGROVE TH CONDO</b> <b>ASSOCIATION,</b> <i>Plaintiff</i>	§ § § § § § § § § § §	<b>CIVIL ACTION NO. 4:23-CV-01135</b>  <b>JURY DEMANDED</b>
v.		
<b>JOURNEY</b> <b>COMPANY,</b> <i>Defendant</i>		

**JOINT MOTION TO DISMISS WITH PREJUDICE**

TO THE HONORABLE JUDGE OF SAID COURT:

Plaintiff **Tanglegrove TH Condo Association** and Defendant **Journey Insurance Company** hereby file this Joint Motion to Dismiss. The Parties have completed the appraisal process previously ordered by the Court, and Defendant has made payment of the resulting award and statutory interest under the Texas Insurance Code. All other claims between the parties, including the question of attorneys' fees, have been settled. Accordingly, the Parties request that this Court lift the stay presently in effect in this action put in place by the Court on November 2, 2023<sup>1</sup>, and then dismiss this suit with prejudice.

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<sup>1</sup> ECF No. 24.

Respectfully submitted,

**BAIN & BARKLEY**

*A Partnership of Professional Corporations*

BY:   
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**ATTORNEYS FOR DEFENDANT  
JOURNEY INSURANCE COMPANY**

AND

**/s/ Shannon E. Loyd w/p 04/26/2024**\_\_\_\_\_

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**ATTORNEYS FOR PLAINTIFF  
TANGLEGROVE TH CONDO ASSOCIATION**

**CERTIFICATE OF SERVICE**

I hereby certify that on **April 26, 2024**, I e-filed this document using the Court's ECF System, thereby serving this document on all parties and counsel of record in this case, as follows:

**VIA CM/ECF:**

**Shannon E. Loyd**

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*Attorneys for Plaintiff*

A handwritten signature in black ink, appearing to read "T. Ryan Lemens", positioned above a horizontal line.

T. Ryan Lemens